Statement of Basis of the Federal Operating Permit

The Dow Chemical Company

Site Name: Dow Beaumont Aniline
Physical Location: 5470 Twin City Highway
Nearest City: Nederland
County: Jefferson

Permit Number: O1961 Project Type: Minor Revision

The North American Industry Classification System (NAICS) Code: 325192 NAICS Name: Cyclic Crude and Intermediate Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

A description of the facility/area process description;

A description of the revision project;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: August 8, 2019

Operating Permit Basis of Determination

Description of Revisions

Incorporate the new Nitrobenzene Production Unit (MNB) and amended NSR permit 4351 issued on 3/21/2019 into the SOP. Units added include ANI/FMNB (fugitive area) and PRO-NBHON (SOCMI HON process) and unit specific applicable requirements.

Permit Area Process Description

Aniline Product is manufactured by catalytic hydrogenation of nitrobenzene. The aniline product is the result of refining crude aniline produced by the reactor. The refining consists of water and tar removal. The aniline product is sold in barge, rail car, ISO containers, and tank trucks. Hydrogen is supplied by pipeline to the manufacturing site. The majority of the nitrobenzene used in the aniline reaction is produced on site. The nitrobenzene process combines benzene and nitric acid in the presence of sulfuric acid to generate mono-nitrobenzene. The crude nitrobenzene is neutralized and washed to remove any mineral acidity. The crude nitrobenzene is then stripped of unreacted benzene. The benzene is recovered and returned to the nitrobenzene reaction system. Ammonia used for the process is a raw material that is delivered to the site by pipeline. The manufacture of nitrobenzene and aniline produce an excess of process water. This water is steam stripped to remove recoverable organics, neutralized, filtered and disposed of via an on-site deep well.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, HAPS, CO
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Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - o Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - o Compliance Requirements
 - o Protection of Stratosphere Ozone

- Permit Location
- Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - o Additional Monitoring Requirements
 - o Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - o Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify

monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9

observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to

which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/TF189E	30 TAC Chapter 115, Storage of VOCs	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TF189E	40 CFR Part 60, Subpart Ka	60Ka-1	Product Stored = Stored product other than a petroleum liquid
ANI/TF189E	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
ANI/TF189W	30 TAC Chapter 115, Storage of VOCs	R5117E1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TF189W	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)
ANI/TF189W	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
ANI/TF203A	30 TAC Chapter 115, Storage of VOCs	R5117A	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC
ANI/TF203B	30 TAC Chapter 115, Storage of VOCs	R5117A	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC
ANI/TFL75	30 TAC Chapter 115, Storage of VOCs	R5112-T-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.

Unit ID	Regulation	Index Number	Basis of Determination*
			Tank Description = Tank using an internal floating roof (IFR)
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TFL75	40 CFR Part 60,	60K-T-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978
	Subpart K		Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters)
			Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)
ANI/TFL75	40 CFR Part 63, Subpart G	63G-T-3	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).
			Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)
			NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)
			Emission Control Type = Internal floating roof
ANI/TFX102	30 TAC Chapter 115, Storage of VOCs	R5117C2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX102	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX192	30 TAC Chapter 115, Storage of	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX192	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX194	30 TAC Chapter 115, Storage of	R5117D	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls

Unit ID	Regulation	Index Number	Basis of Determination*
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
ANI/TFX194	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX194	40 CFR Part 63,	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	Subpart G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX200	30 TAC Chapter 115, Storage of	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX200	40 CFR Part 60,	rt 60, 60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978
	Subpart K		Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)
ANI/TFX205	30 TAC Chapter 115, Storage of	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TFX205	40 CFR Part 63,	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	Subpart G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX261	30 TAC Chapter 115, Storage of	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 40,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/TFX261	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX261	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX285	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX285	40 CFR Part 63, Subpart G	63G-T-2	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX59	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX59	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
ANI/TFX61	30 TAC Chapter 115, Storage of VOCs	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TFX61	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/TFX61	40 CFR Part 63,	63G-132	Process Wastewater = The tank receives, manages, or treats process wastewater streams
	Subpart G		Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank are sparged.
			Wastewater Tank Properties = Volume of the wastewater tank greater than or equal to 151m3 and vapor pressure of liquid stored is less than 5.2 kPa
ANI/TFX72	30 TAC Chapter 115, Storage of	R5117B	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is less than or equal to 1,000 gallons
ANI/TFX90	30 TAC Chapter 115, Storage of	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TFX90	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX91A	30 TAC Chapter 115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Tank Description = Tank does not require emission controls
		Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia	Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 40,000 gallons
ANI/TFX91A	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX91A	40 CFR Part 63,	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	Subpart G	ubport C	NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX91B	30 TAC Chapter 115, Storage of	R5117E	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 40,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/TFX91B	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX91B	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX92A	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia
ANI/TFX92A	40 CFR Part 60, Subpart K	60K-1	Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Construction/Modification Date = On or before June 11, 1973
ANI/TFX92A	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX92B	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX92B	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX92B	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX92C	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia

Unit ID	Regulation	Index Number	Basis of Determination*
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI/TFX92C	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973
ANI/TFX92C	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/TFX94	30 TAC Chapter 115, Storage of VOCs	R5117A	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC
ANI-TFX259	30 TAC Chapter 115, Storage of VOCs	R5117C	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.0 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
ANI-TFX259	40 CFR Part 63, Subpart G	63G-T-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
ANI/DWTRK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/DWTRK	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/LRC195	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Loading and unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/LRC195	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/LRC97	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Loading and unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/LRC97	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/LTR98	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Loading and unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/LTR98	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/LTR99	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Loading and unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/LTR99	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/ORGTRK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/ORGTRK	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/VACTRK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
ANI/VACTRK	40 CFR Part 63, Subpart G	63G-L-1	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.
ANI/FLR296	30 TAC Chapter 111, Visible Emissions	R1111-1	Emergency/Upset Conditions Only = Flare is used only under emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.
ANI/FLR296	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
ANI/FLR296	40 CFR Part 63, Subpart A	63A-1	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
ANI/FLR373	30 TAC Chapter 111, Visible Emissions	R1111-F-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.
ANI/FLR373	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4)(i)-(iii) or (c)(5). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec) Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
ANI/FLR373	40 CFR Part 63, Subpart A	63A-F-1	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec) Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
ANI/FLR374	30 TAC Chapter 111, Visible Emissions	R1111-F-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/FLR374	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
ANI/FLR374	40 CFR Part 63, Subpart A	63A-F-1	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.
	,		Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).
			Flare Assist Type = Non-assisted
			Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).
			Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
ANI/FMNB	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-ALL	SOP/GOP Index No. = Owner/Operator assumes VOC fugitive control requirements for all components subject to 30 TAC Chapter 115, Subchapter D, Division 3 with no alternate control or control device.
ANI/FMNB	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.
GRP-ANIFUG	30 TAC Chapter 115, Pet. Refinery	Refinery	SOP/GOP Index No. = Owner/Operator assumes VOC fugitive control requirements for all components subject to 30 TAC Chapter 115, Subchapter D, Division 3 with no alternate control or control device.
	& Petrochemicals		Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.
			Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.
			Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.
GRP-ANIFUG	40 CFR Part 63, Subpart H	63HALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.
ANI/CLT208	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
ANI/DCN201	30 TAC Chapter 115, Water	er R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.
	Separation		Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.
ANI/DCN257	30 TAC Chapter 115, Water		Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.
	Separation		Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.
ANI/DCN258	30 TAC Chapter 115, Water Separation	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.

Unit ID	Regulation	Index Number	Basis of Determination*	
			Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
ANI/DCN284	30 TAC Chapter 115, Water Separation	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
ANI/DCN60	30 TAC Chapter 115, Water Separation	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
ANI/DEC	30 TAC Chapter 115, Water Separation	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131. Control Device = Control device or vapor recovery system other than a chiller, carbon adsorber, or incinerator.	
ANI/DEC	30 TAC Chapter 115, Water Separation	R5131-W-1A	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131. Control Device = Direct flame incinerator.	
ANI/HOTDEC	30 TAC Chapter 115, Water Separation	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131. Control Device = Control device or vapor recovery system other than a chiller, carbon adsorber, or incinerator.	
ANI/HOTDEC	30 TAC Chapter 115, Water Separation	R5131-W-1A	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance via 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131. Control Device = Direct flame incinerator.	
ANI/TFX87	30 TAC Chapter 115, Water Separation	R5131-W-2	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance 30 TAC § 115.910. Exemption = Water separator does not qualify for exemption. Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131.	

Unit ID	Regulation	Index Number	Basis of Determination*	
			Control Device = Control device or vapor recovery system other than a chiller, carbon adsorber, or incinerator.	
ANI/TFX88	30 TAC Chapter 115, Water	R5131-W-2	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	
	Separation		Exemption = Water separator does not qualify for exemption.	
			Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131.	
			Control Device = Control device or vapor recovery system other than a chiller, carbon adsorber, or incinerator.	
ANI/XTR288	30 TAC Chapter 115, Water	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	
	Separation		Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
ANI/XTR289	30 TAC Chapter 115, Water	R5131-W-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	
	Separation		Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
ANI/FIL90	30 TAC Chapter 115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).	
			VOC Concentration = VOC concentration is less than 612 ppmv.	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/FLR373	30 TAC Chapter		Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			Control Device Type = Smokeless flare	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	

Unit ID	Regulation	Index Number	Basis of Determination*	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
ANI/FLR373	30 TAC Chapter	R5121-V-1A	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			Control Device Type = Smokeless flare	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
ANI/FLR373	40 CFR Part 63, Subpart G	63G-V-1	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	
			Control Device = Flare	
			Overlap = Title 40 CFR Part 63, Subpart G only	
			Group 1 = The process vent meets the definition of a Group 1 process vent.	
			Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. Halogenated = Vent stream is not halogenated.	
			By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.	
			Electing Control = Electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) without calculating the TRE index value.	
			Flow Indicator = By-pass line valve is secured with a car-seal or lock-and-key type configuration.	
			Performance Test = No previous performance test was conducted.	
ANI/FLR374	30 TAC Chapter 115, Vent Gas	R5121-V-1	Alternate Control Requirement = Alternate control is not used.	
	Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Smokeless flare	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
ANI/FLR374	40 CFR Part 63, Subpart G	63G-V-1	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	

Unit ID	Regulation	Index Number	Basis of Determination*	
			Control Device = Flare	
			Overlap = Title 40 CFR Part 63, Subpart G only	
			Group 1 = The process vent meets the definition of a Group 1 process vent.	
			Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.	
			Halogenated = Vent stream is not halogenated.	
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.	
ANI/RED373	30 TAC Chapter	R111B	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
	111, Visible Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.	
			Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).	
			Construction Date = After January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.	
ANI/RED373	30 TAC Chapter		Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
ANI/RED373	30 TAC Chapter	R5121-V-1A	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
ANI/RED373	40 CFR Part 63, Subpart G	63G-V-1	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	
			Control Device = Thermal incinerator.	
			Overlap = Title 40 CFR Part 63, Subpart G only	
			Group 1 = The process vent meets the definition of a Group 1 process vent.	
			Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.	
			Halogenated = Vent stream is not halogenated.	

Unit ID	Regulation	Index Number	Basis of Determination*	
			By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.	
			Flow Indicator = By-pass line valve is secured with a car-seal or lock-and-key type configuration.	
			Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.	
ANI/SMP198	30 TAC Chapter	R5121-V-3	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX255 30 TAC Chapter 115, Vent Gas			Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX260	X260 30 TAC Chapter R5121-V-1	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls	rols	Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX290	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	

Unit ID	Regulation	Index Number	Basis of Determination*	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX71	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX72	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI/TFX84 30 TAC Chapter 115, Vent Gas		R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-AN262A	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-CTF286	30 TAC Chapter 115, Vent Gas Controls	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	

Unit ID	Regulation	Index Number	Basis of Determination*	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TF2561	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
	30 TAC Chapter 115, Vent Gas	ent Gas	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TFX282	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TFX283	30 TAC Chapter 115, Vent Gas	Vent Gas	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	

Unit ID	Regulation	Index Number	Basis of Determination*	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TFX70	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TFX74	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
ANI-TFX85	30 TAC Chapter 115, Vent Gas	R5121-V-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
	Controls		Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.	
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).	
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
GRP-	30 TAC Chapter		Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
PRE72VENTS	111, Visible Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.	
			Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).	
			Construction Date = On or before January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.	
ANI/CDR82	40 CFR Part 60, Subpart NNN	60NNN-1	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.	
			Construction/Modification Date = On or before December 30, 1983.	

Unit ID	Regulation	Index Number	Basis of Determination*
ANI/STR68	40 CFR Part 60, Subpart NNN	60NNN-1	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, or intermediate. Construction/Modification Date = On or before December 30, 1983.
ANI/RXPRC	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. Construction/Modification Date = On or before June 29, 1990.
PRO-ANIHON	40 CFR Part 63, Subpart F	63F-PU-1	Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).
			Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.
			Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.
			Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.
			Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.
			NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.
			Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).
			Heat Exchange System = A heat exchange system is utilized.
			Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.
			Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.
			Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.
PRO-NBHON	40 CFR Part 63, Subpart F	63F-01	Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).
			Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.
			Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.
			Heat Exchange System = A heat exchange system is utilized.
			Cooling Water Pressure = The heat exchange system is operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

^{* -} The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the "as applicable" language. The "as applicable" language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.				
Authorization No.: 4351	Issuance Date: 03/21/2019			
Permits By Rule (30 TAC Chapter 106) for the	Application Area			
Number: 106.261	Version No./Date: 09/04/2000			
Number: 106.262	Version No./Date: 09/04/2000			
Number: 106.262	Version No./Date: 11/01/2003			
Number: 106.263	Version No./Date: 11/01/2001			
Number: 106.371	Version No./Date: 09/04/2000			
Number: 106.373	Version No./Date: 09/04/2000			
Number: 106.452	Version No./Date: 09/04/2000			
Number: 106.472	Version No./Date: 09/04/2000			
Number: 106.478	Version No./Date: 09/04/2000			
Number: 106.532	Version No./Date: 03/14/1997			
Number: 106.533	Version No./Date: 09/04/2000			

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information					
ID No.: ANI/RED373					
Control Device ID No.: N/A	Control Device Type: Unknown CD Type				
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R111B				
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)				
Monitoring Information					
Indicator: Visible Emissions					
Minimum Frequency: Once per calendar quarter					
Averaging Period: n/a					
Deviation Limit: There shall be no visible emissions.					

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information	
Only Group/Frocess information	
ID No.: GRP-PRE72VENTS	
Control Device ID No.: N/A	Control Device Type: Unknown CD Type
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R111A
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions.	

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (https://www.tceq.texas.gov/goto/cfr-online). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceg.texas.gov/permitting/air/nav/air pbr.html

Available Unit Attribute Forms

- OP-UA1 Miscellaneous and Generic Unit Attributes
- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- **OP-UA8 Coal Preparation Plant Attributes**
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 Stationary Turbine Attributes
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- OP-UA14 Water Separator Attributes
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- **OP-UA18 Surface Coating Operations Attributes**
- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- OP-UA58 Treatment Process Attributes
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes